

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO,
et al.,

Plaintiffs,

V.

Civil Action No. 1:25-cv-10276

CHARLES EZELL, ACTING DIRECTOR,
OFFICE OF PERSONNEL
MANAGEMENT, et al,

Defendants.

DEFENDANTS' CONSENT MOTION FOR ENLARGEMENT OF PAGES

Defendants move pursuant to Local Rule 7.1(b)(4) for leave of Court to file an overlong memorandum in support of Defendants' upcoming motion to dismiss. Defendants have good cause to request an additional 7 pages due to the complexity of the issues before the Court. Plaintiffs' Amended Complaint raises numerous and substantial legal questions, which require nuanced attention. Even with such an enlargement, Defendants would endeavor to address all issues succinctly. Defendants further request a commensurate extension of Plaintiffs' page limit for any opposition to Defendants' motion to dismiss.

Defendants contacted Plaintiffs for their position on this motion, and Plaintiffs consented to the requested enlargement of pages and a commensurate enlargement for their opposition.

For the foregoing reasons, Defendants respectfully request that the Court grant this motion for an overlong brief.

Dated: May 6, 2025

Respectfully submitted,

/s/ Joshua E. Gardner
JOSHUA E. GARDNER
(FL Bar No. 302820)

Special Counsel

JASON ALTABET

Trial Attorney

KEVIN BELL

Trial Attorney

United States Department of Justice

Civil Division, Federal Programs Branch

1100 L St. NW

Washington, DC 20005

Phone: (202) 305-7583

CERTIFICATE OF SERVICE

On May 6, 2025, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court for the District of Massachusetts, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Fed. R. Civ. P. 5(b)(2).

/s/ Joshua E. Gardner
JOSHUA E. GARDNER
(FL Bar No. 302820)
Special Counsel